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March 22, 2024

Via Electronic Filing

Hon. Zahid N. Quraishi
United States District Court
Clarkson S. Fisher Building
402 East State Street
Trenton, New Jersey 08608

Re: Andy Kim, et al. v. Hanlon, et al.
Docket No. 3:24-cv-01098-ZNQ-TJB

Dear Judge Quraishi:

This office represents Intervenor Camden County Democratic Committee ("CCDC") in the above matter. On March 18, 2024, Counsel for Defendants Christopher J. Durkin, Joanne Rajoppi, and Danielle Ireland-Imhof in their official capacity as County Clerks for Essex, Union, and Passaic Counties, respectively, filed the following Motions *in Limine*:

- Motion *in Limine* No. 1 to Exclude All Proposed Testimony of Plaintiffs' Experts (ECF No. 152);
- Motion *In Limine* No. 2 to Exclude Expert Testimony from Dr. Julia Sass Rubin Pursuant to Fed. R. Evid. 702 (ECF No. 153);
- Motion *in Limine* No. 3 to Exclude Expert Testimony from Andrew W. Appel Pursuant to Fed. R. Evid. 702 (ECF No. 154);
- Motion *in Limine* No. 4 to Exclude Expert Testimony from Dr. Samuel S.-H. Wang Pursuant to Fed. R. Evid. 702 (ECF No. 155);
- Motion *in Limine* No. 5 to Exclude Expert Testimony from Dr. Josh Pasek Pursuant to Fed. R. Evid. 702 (ECF No. 156);
- Motion *in Limine* No. 6 to Exclude Rebuttal Expert Testimony from Dr. Josh Pasek Pursuant to Fed. R. Civ. P. 26 (ECF No. 157); and
- Motion *in Limine* No. 7 to Exclude Expert Testimony from Mr. Ryan Macias (ECF No. 158).

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Please be advised that CCDC joins in on these Motions *in Limine* and relies upon the arguments set forth therein.

Respectfully submitted,
BROWN & CONNERY, LLP

s/ William M. Tambussi
William M. Tambussi

cc: All Counsel of Record (*via ECF*)